

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

Case 1:24-cv-06563

**DECLARATION OF MAGGIE E. MACCURDY
IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGEMENT**

I, Maggie E. MacCurdy, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.

2. On December 21, 2023, Defendant filed a voluntary chapter 11 petition in the United States Bankruptcy Court for the Southern District of New York (the "Giuliani Bankruptcy Proceeding"). *See In re Rudolph W. Giuliani*, No. 23-12055-SHL (Bankr. S.D.N.Y. Dec. 21, 2023). A true and correct copy of that petition is attached as Exhibit A.

3. On January 26, 2024, Defendant filed an Affidavit Pursuant to Local Rule 1007-1(b) and Schedules in *In re Rudolph W. Giuliani*. A true and correct copy of that filing is attached as Exhibit B.

4. On February 7, 2024, Mr. Giuliani testified under oath in his bankruptcy case, at the Meeting of Creditors pursuant to Section 341 of the Bankruptcy Code. A true and correct copy of the transcript from that meeting is attached as Exhibit C.

5. On July 15, 2024, Mr. Giuliani filed an “affidavit of domicile” with the Clerk of Palm Beach County. A true and correct copy of that affidavit is attached as Exhibit D.

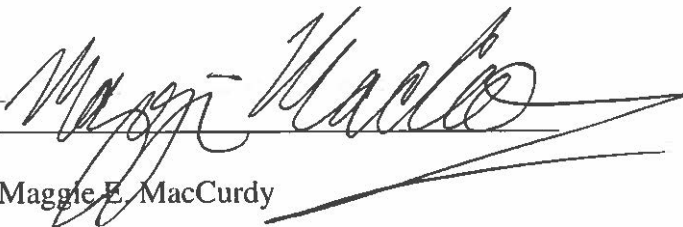
6. On August 8, Plaintiffs recorded a certified copy of their registered judgment with the Clerk of Palm Beach County. A true and correct copy of their registered judgment is attached as Exhibit E.

7. The Palm Beach Condo was previously owned by Mr. Giuliani and his ex-wife, Judith. Mr. Giuliani has been the sole owner of the Palm Beach Condo since January 14, 2020, when a Quickclaim Deed was made to Mr. Giuliani. A true and correct copy of that deed is attached as Exhibit F.

8. On February 5, 2024, Mr. Giuliani filed an Addendum to Statement of Financial Affair No.: 6, in *In re Rudolph W. Giuliani*. A true and correct copy of that Addendum is attached as Exhibit G.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 2, 2024.


Maggie E. MacCurdy